

Attorneys admitted in
California, New York,
Texas, Pennsylvania, and
Colorado, and Illinois

Sender's contact:
djenkins@donigerlawfirm.com
(310) 590-1820



Doniger / Burroughs Building
603 Rose Avenue
Venice, California 90291

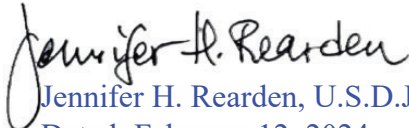
Doniger / Burroughs NY
247 Water Street, First Floor
New York, New York 10038

February 10, 2024

Application GRANTED. The Clerk of Court is
directed to place ECF No. 140-9 under seal.
SO ORDERED.

DELIVERED VIA ECF

The Honorable Jennifer H. Rearden
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 12B
New York, NY 10007-1312


Jennifer H. Rearden, U.S.D.J.
Dated: February 12, 2024

Case Title: *Elliot McGucken v. Shutterstock, Inc. et al., 1:22-cv-00905-JHR*
Re: **Letter Motion to Seal Inadvertently Filed Documents**

Your Honor:

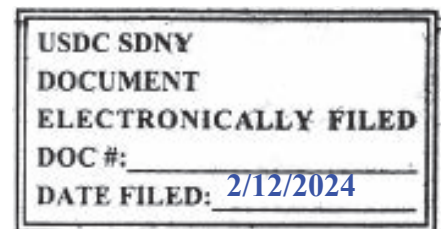
Our office represents the Plaintiff, Elliot McGucken, in the above reference case. We write to the Court to respectfully request that document filed at ECF Docket No. 140-9 be sealed.

This document is the deposition transcript of Heather Shimmin and was filed in connection with the Court's Order on Plaintiff's Motion for Leave to File Under Seal, in which the Court ordered that the document be publicly filed with certain redactions. (Dkt. No. 136). The document as filed contains those redactions but also inadvertently contains duplicates of certain pages with unredacted testimony. Our office has promptly notified the Clerk of Court of this inadvertent filing and submitted an emergency sealing request accordingly. A notice of lodging with the corrected document has been concurrently filed. We apologize for this error and thank Your Honor for your prompt attention to this matter. We respectfully request that this Motion to seal be granted.

Respectfully submitted,

Date: February 10, 2024

By: /s/ David MS Jenkins
Scott Alan Burroughs, Esq.
David MS Jenkins, Esq.
DONIGER / BURROUGHS
For the Plaintiff



SO ORDERED.

Dated: _____

Honorable Jennifer H. Rearden, U.S.D.J.